



PROGRESS REPORT NO. 16

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DATE: November 10, 2007 **FILE NO:** 1-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study (RI/FS) - Progress Report No. 16 Month Ending October 2007

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of the activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Following the submittal of the revised RI/FS work plan on September 21, 2007, an on-line GoToMeeting™ was conducted on October 10, 2007 to review and discuss clarifying questions related to the RI/FS work plan and outlined within Progress Report No. 15; and to review and discuss preliminary results associated with the screening level ecological risk assessment (SLERA). Presentation materials from the October 10th meeting and additional material prepared as follow-up to the meeting are available on the secure domain of the project website (<https://www.ucr-rifs.com>). At the time of writing, no official comments have been received on the revised RI/FS work plan but are anticipated in the near future.

As outlined during the aforementioned on-line meeting, a number of field sampling programs are planned for the spring of 2008 (i.e., surface water and beach¹/floodplain sampling). As a result, TCAI and its technical team are in the process of preparing “straw man” proposals to be reviewed with EPA and participating parties in the near

¹ TCAI received a letter on October 17, 2007 acknowledging that the February 2007 draft quality assurance project plan for the “2007 Sediment Investigation of Beaches and Depositional Areas” will require revisions and re-submittal.

future. At the time of writing, and due to efforts presently being focused on the revised RI/FS work plan, dates for on-line meetings to present “straw man” proposals have not been confirmed. However, based on preliminary discussions during the weekly Remedial Project Manager calls, it anticipated that the surface water “straw man” proposal could be reviewed during the last week of November 2007 (e.g., November 28th or 29th); while the beach/floodplain “straw man” proposal would be presented in the month of December 2007.

Based on discussions associated with the draft SLERA during the October 10th on-line meeting, minor modifications will be made to the draft document and submitted to EPA and participating parties for review. For planning purposes, it anticipated that TCAI will be in a position to submit the draft SLERA no later than mid-December 2007.

Planning activities related to a potential UCR Workshop, tentatively planned for January 2008, have also been initiated. It is anticipated that participants from the April 2007 workshop will also participate in the January 2008 Workshop.

A summary of activities (e.g., deliverables) completed to date, and those anticipated within in the near future, are presented within Table 1 below.

Table 1. Upper Columbia River Remedial Investigation/Feasibility Study Summary of On-Going and Planned Activities

Task No.	Task Description	Status	Issues	Estimated Completion Date ¹
1.	2005 Field Data Transfer	Complete	None to report at this time	<u>July 31, 2006</u>
2.	Technical Memorandum ² .	Complete	None to report at this time	<u>October 27, 2006</u>
3.	Draft RI/FS Work Plan	Complete	None to report at this time	<u>December 28, 2006</u>
4.	Sampling and Analysis Plan (SAP) ³	Complete	None to report at this time	<u>February 26, 2007</u>
5.	Health and Safety Plan	Complete	None to report at this time	<u>February 26, 2007</u>
6.	Cultural Resources Coordination Plan	Complete	None to report at this time	<u>February 26, 2007</u>
7.	Revised RMAO Memorandum ⁴ .	Complete	None to report at this time	<u>March 11, 2007</u>
8.	Additional Trail Data	Complete	None to report at this time	<u>May 6, 2007</u> ⁵
9.	April Workshop Summary	Complete	None to report at this time	<u>July 12, 2007</u>
10.	Revised RI/FS Work Plan	Complete	None to report at this time	<u>September 21, 2007</u>
11.	Screening Level ERA	On-Going	None to report at this time	December 2007
12.	Surface Water SAP	On-Going	None to report at this time	TBD ⁶ .

Notes: 1. Dates that have been underlined represent the actual day that the respective deliverable was submitted to EPA as per Paragraph 80 of the Agreement.

2. As outlined within the Agreement, the technical memorandum outlines and described the Risk-Based Remedial Objectives for the Ecological Risk Assessment. Remedial objectives for the protection of human health will be prepared by EPA and submitted under separate cover at a later date.

3. The SAP submitted in fulfillment of Paragraph 13 of the Agreement was the *2007 Sediment Investigation of Beaches and Depositional Areas*.

4. The draft technical memorandum on risk-based management action objectives (RMAOs) was revised per EPA's January 16, 2007 comments.

5. Following a request outlined by EPA in a letter dated February 1, 2007 (received on February 5, 2007) TCAI has compiled additional information on the Trail Facility so as to assist in the identification of chemicals of concern (COIs) as outlined within Paragraph 24 of the Agreement. An electronic version of the deliverable was forwarded to EPA on May 6, 2007 with hard copies delivered shortly thereafter. In addition, a second deliverable identified as "*Business Confidential*" information was submitted to EPA legal counsel under separate cover on May 7, 2007 by Pillsbury Winthrop Shaw Pittman (i.e., TCAI legal counsel) on behalf of TCAI.

6. It is anticipated that the surface water sampling and analysis plan (SAP) will be submitted before the end of the year but an exact date has not yet been determined and may depend on the level of feedback received from EPA following on-line meetings/presentations using GoToMeeting™ and on the revised RI/FS work plan.

7. ERA = Ecological Risk Assessment
SAP = Sampling & Analysis
TBD = To Be Determined

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-892-2585.